

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KENNETH AND PAMELA PRICE JEAN,)	CIVIL ACTION NO. 03-12306-FDS
Plaintiffs)	
v.)	
CITY OF ASHBURNHAM POLICE)	
DEPARTMENT, CITY OF WINCHENDON)	
POLICE DEPARTMENT, ROB HARRINGTON,)	
in his capacity as CHIEF OF THE WINCHENDON)	
POLICE DEPARTMENT, JACK MURRAY, in)	
his capacity as CHIEF OF THE ASHBURNHAM)	
POLICE DEPARTMENT, TODD C. PARSONS,)	
RAYMOND M. ANAIR, ROBERT BRENNON,)	
WILLIAM P. GEOFFROY, BRIAN HART,)	
KEVIN AHEARN, KEVIN E. WOLSKI,)	
OFFICER JOHN DOE, OFFICER JOHN POE,)	
Defendants)	

**ASSENTED TO MOTION TO EXTEND SUMMARY JUDGMENT
DEADLINE DUE TO PENDING MEDIATION**

Now come the defendants in the above-captioned matter, and hereby move to extend the motion for summary judgment deadline until April 12, 2007, which is forty-five days after the scheduled mediation.

As grounds for this motion, the defendants state that the case is presently scheduled for mediation before United States Magistrate Judge Leo T. Sorokin on February 26, 2007. The additional time requested is necessary to provide the opportunity to fully explore settlement prior to incurring the additional

expense of summary judgment practice.

WHEREFORE, the defendants request the deadline for serving motions for summary judgment be extended until April 12, 2007, which is forty-five days after the scheduled mediation. Respectfully submitted,

Defendants,
TOWN OF ASHBURNHAM POLICE
DEPARTMENT, JACK MURRAY, TODD
PARSONS, ROBERT BRENNON, BRIAN
HART AND KEVIN AHEARN,
By their attorneys,
PIERCE, DAVIS & PERRITANO, LLP

/s/ John J. Cloherty III
John J. Cloherty III, BBO #566522
Ten Winthrop Square
Boston, MA 02110
(617) 350-0950

Defendants,
TOWN OF ASHBURNHAM POLICE
DEPARTMENT, JACK MURRAY, TODD
PARSONS, ROBERT BRENNON AND
KEVIN AHEARN,
By their attorneys,

/s/ Regina M. Ryan
Douglas I. Louison, BBO #545191
Regina M. Ryan, BBO #565246
Merrick, Louison & Costello, LLP
67 Batterymarch Street
Boston, MA 02110
(617) 439-0305

Defendants,
TOWN OF WINCHENDON POLICE
DEPARTMENT, ROB HARRINGTON,
RAYMOND M. ANAIR, WILLIAM P.
GEOFFROY AND KEVIN E. WOLSKI,
By their attorney,

/s/ Nancy Frankel Pelletier
Nancy Frankel Pelletier; BBO # 544402
Robinson Donovan, P.C.
1500 Main Street, Suite 1600
Springfield, MA 01115
(413) 732-2301

Defendants,
JACK MURRAY, TODD PARSONS AND
ROBERT BRENNON,
By their attorneys,

/s/ Andrew J. Gambaccini
Michael J. Akerson, BBO# 558565
Andrew J. Gambaccini, BBO# 654690
Reardon, Joyce & Akerson, P.C.
397 Grove Street
Worcester, MA 01605
(508) 754-7285

ASSENTED TO BY PLAINTIFF,
KENNETH JEAN,
By his attorney,

ASSENTED TO BY PLAINTIFF,
Plaintiff,
PAMELA JEAN,
By her attorney,

/s/ Andrew M. Fischer

Andrew M. Fischer, BBO #167040
Jason & Fischer
47 Winter Street
Boston, MA 02108
(617) 423-7904

/s/ Mark D. Stern

Mark D. Stern, BBO #479500
Mark D. Stern, P.C.
34 Liberty Avenue
Somerville, MA 02144
(617) 776-4020

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon each attorney of record, or pro se litigant, by electronic mail.

12/22/06 /s/ John J. Cloherty

Date